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Proposed Attorneys for Chapter 7 Trustee

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF UTAH**

In re:

SAFEMOON US LLC,

Debtor.

Bankruptcy Case No. 23-25749
Chapter 7

Honorable Joel T. Marker

**NOTICE OF MOTION OF ELLEN E. OSTROW, CHAPTER 7 TRUSTEE, FOR AN
ORDER PURSUANT TO 11 U.S.C. §§ 105, 363, AND 721 AUTHORIZING THE
CHAPTER 7 TRUSTEE TO OPERATE THE DEBTOR'S BUSINESS ON A LIMITED
BASIS EFFECTIVE AS OF THE PETITION DATE FOR THE SOLE PURPOSE OF
(A) LIQUIDATING THE BUSINESS AND EMPLOYING THE DEBTOR'S FORMER
EMPLOYEES AS INDEPENDENT CONTRACTORS AND TO PAY FOR SERVICES;
AND (B) FOR ADDITIONAL RELIEF AND NOTICE OF HEARING**

Objection Deadline: December 18, 2023 at 3:00 p.m. (MT)
Hearing Date: December 18, 2023 at 3:00 p.m. (MT)

PLEASE TAKE NOTICE THAT, on December 18, 2023, Ellen E. Ostrow (the “*Trustee*”), the duly-appointed trustee in the above-entitled Chapter 7 bankruptcy case (the “*Bankruptcy Case*”) filed by SafeMoon US LLC (the “*Debtor*”), by and through her undersigned proposed counsel, filed the *Motion of Ellen E. Ostrow, Chapter 7 Trustee, for an Order Pursuant*

to 11 U.S.C. §§ 105, 363, and 721 Authorizing the Chapter 7 Trustee to Operate the Debtor's Business on a Limited Basis Effective as of the Petition Date for the Sole Purpose of (A) Liquidating the Business and Employing the Debtor's Former Employees as Independent Contractors and to Pay for Services; and (B) For Additional Relief (the “**Motion**”) filed by the Trustee on December 18, 2023. The Trustee has asked the Court hear the Motion on an expedited basis.

YOUR RIGHTS MAY BE AFFECTED. YOU SHOULD READ THE MOTION CAREFULLY, AND DISCUSS IT WITH YOUR ATTORNEY, IF YOU HAVE ONE IN THIS BANKRUPTCY CASE. IF YOU DO NOT HAVE AN ATTORNEY, YOU MAY WISH TO CONSULT ONE.

In the Motion, the Trustee asks the Court to authorize her to (a) operate the Debtor's business on a limited basis effective as of the Petition Date for the period of up to sixty (60) days for the sole purpose of winding down the business, and (b) employing and paying the Debtor's former employees for their services, including pre-petition wages owed up to the priority cap under 11 U.S.C. § 507(a)(4).

If you do not want the Court to grant the relief requested in the Motion, or you want the Court to consider your view, then you or your attorney must attend a hearing on the Motion on **December 18, 2023 at 3:00 p.m. (MT)** before the Honorable Joel T. Marker. This hearing will be conducted remotely by Zoom. Zoom access instructions for the hearing are as follows:

www.utb.uscourts.gov/court-hearings-be-conducted-zoom

Meeting ID:161 5478 8875

Passcode: 3834658

+1 669 254 5252

Failure to attend the hearing will be deemed a waiver of your objection. If you or your attorney do not take these steps, the Bankruptcy Court may decide that you do not oppose the relief sought in the Motion and may enter an order granting that relief.

DATED: December 18, 2023.

/s/ Ellen E. Ostrow

ELLEN E. OSTROW, Chapter 7 Trustee

CERTIFICATE OF SERVICE

I hereby certify that on the 18th day of December, 2023, a true and correct copy of the foregoing **NOTICE OF MOTION OF ELLEN E. OSTROW, CHAPTER 7 TRUSTEE, FOR AN ORDER PURSUANT TO 11 U.S.C. §§ 105, 363, AND 721 AUTHORIZING THE CHAPTER 7 TRUSTEE TO OPERATE THE DEBTOR'S BUSINESS ON A LIMITED BASIS EFFECTIVE AS OF THE PETITION DATE FOR THE SOLE PURPOSE OF (A) LIQUIDATING THE BUSINESS AND EMPLOYING THE DEBTOR'S FORMER EMPLOYEES AS INDEPENDENT CONTRACTORS AND TO PAY FOR SERVICES; AND (B) FOR ADDITIONAL RELIEF AND NOTICE OF HEARING** was electronically filed and therefore served via ECF on the following:

Mark C. Rose mrose@mbt-law.com
United States Trustee USTPRegion19.SK.ECF@usdoj.gov

/s/ Ellen E. Ostrow